

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

Besslindora Goree,	CIVIL ACTION
<i>Plaintiff</i>	No. 2:10-cv-2271-LDD
VS.	
Lower Merion School District	JURY OF 12 DEMANDED
<i>Defendant</i>	

JOINT PROPOSED DISCOVERY PLAN

Plaintiff and Defendant (collectively the "Parties"), by and through their undersigned counsel, hereby submit the following joint proposed discovery plan pursuant to Federal Rule of Civil Procedure 26(f):

1. Counsel for Plaintiff represents that he has provided the information required by Federal Rule of Civil Procedure 26(a)(1). Defendant will comply with Rule 26(a)(1) within the time allotted by the rules.
2. Discovery is needed on the following subjects:

Plaintiff requires discovery concerning the facts and circumstances related to Plaintiff's claims and damages, including but not limited to each of Defendant's affirmative defenses.

Defendant requires discovery concerning the same. The parties recognize and hereby acknowledge that this does not represent an agreement as to the proper scope of discovery and that there are potential disputes regarding said scope of discovery

3. Discovery should not be conducted in phases or be limited to particular issues.
4. The Parties propose the following deadlines and limitations on discovery.
 - (a) Maximum of 25 interrogatories by each party to each other party.
 - (b) Maximum of 10 depositions to be taken by each party.

- (c) Interrogatories, Requests for Production and answers thereto are to be completed by October 15, 2010. However, the Parties reserve the right to seek additional discovery through such means after October 15, 2010, to the extent that new evidence, information, or allegations are raised, set forth, or otherwise articulated during the discovery process, including, but not limited to, information obtained through the initial interrogatories, requests for production, and depositions.
- (d) Fact discovery to be completed by January 15, 2011.
- (e) Motions to amend or to add parties to be filed by TBD.
- (f) Plaintiff's expert report (if needed) due on [n/a] Plaintiff has already provided an expert report through initial disclosures.
- (g) Defendant's expert report (if needed) due on January 30, 2011 _____.
- (h) Expert depositions to be completed by February 14, 2011.
- (i) Dispositive motions to be served within 30 days of completion of discovery.
- (j) The settlement pretrial conference may take place 30 days before the final conference, or if a motion for summary judgment is filed, two (2) weeks following the decision on that motion unless such decision obviates the need for a trial on the merits.
- (k) The final conference may take place 30 days following the settlement pretrial conference to the extent such conference is held. .
- (l) The parties respectfully request a trial date for April of 2011.

5. Subject to the following exceptions, the Parties do not anticipate any discovery issues, challenges or problems.

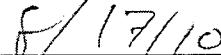
- (a) To the extent that discovery (subject to and without waiving applicable objections) involves the production of employee information, files, or records, the parties will enter into a mutually agreeable confidentiality stipulation for the exchange of confidential, non-public documents or information in discovery. However, if such an agreement cannot be reached, the parties do not waive their right to seek an order to issue pursuant to Federal Rule of Civil Procedure 26(c).
- (b) To the extent that discovery (subject to and without waiving applicable objections) involves the production of student information, files, or records, such discovery is subject to and must be sought in accordance with, *inter alia*, the Family Educational Rights and Privacy Act ("FERPA").

6. As set forth above, the Parties anticipate that discovery may result in the disclosure of confidential or proprietary information. The Parties will address this issue if it arises.
7. The Parties anticipate the possibility of special discovery needs as depositions may be required of individuals who reside and are employed out of state. Accordingly, the parties may require video tape and/or telephone depositions.
8. The Parties do not anticipate extensive electronic discovery will be needed.

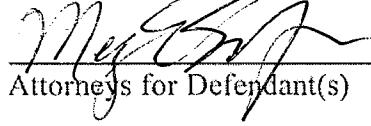


Attorneys for Plaintiff(s)

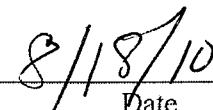
Andrew Costello



Date



Attorneys for Defendant(s)



Date